STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: CERTIFICATION PROCESS :

OF GAS SERVICE EMPLOYEES : DOCKET NO. 3438

RESPONSE OF UNITED STEELWORKERS OF AMERICA LOCAL 12431 TO COMMISSION'S FIRST SET OF DATA REQUESTS

DEFINITIONS:

The Union has the following comments regarding the definitions set forth in the Data Request:

Definition: "Terminate" or "termination" shall mean the physical disconnection of gas service either inside or outside of a residence or commercial building.

Comment: The principal action involved in termination is simply shutting off the gas valve to the gas meter.

Definition: "Restore" or "restoration" shall mean the physical reconnection of gas service, including the re-lighting of any necessary pilot lights.

Comment: Restoration includes a safety inspection by the gas service technician.

Definition: "Activate" or "activation" shall mean the activities involved with the physical connection of gas service, including the lighting of any necessary pilot lights.

Comment: Activation includes a safety inspection by the gas service technician.

REQUEST:

1-1. Please indicate the number of New England Gas Company ("NEGas") employees who are members of the United Steel Workers of America, Local Union 12431 ("USWA").

RESPONSE:

The United Steelworkers of America Local 12431 represents two separate bargaining units at the New England Gas facilities in Providence. One unit includes customer service technicians, construction and maintenance employees, drafting, garage mechanics, plant employees involved in plant operation, and other miscellaneous categories generally related to service and distribution. That unit includes approximately 233 employees. The second unit includes administrative and clerical employees

primarily at the Company's headquarters in downtown Providence. That unit contains between approximately 75 to 80 employees.

REQUEST:

1.2. Please indicate the number of USWA employees of NEGas who, as part of their job duties, terminate, restore or activate gas service.

RESPONSE:

The approximate number of gas service technicians in the bargaining unit represented by United Steelworkers of America Local 12431 is 73 at the present time. New England Gas also employs approximately 25 to 30 customer service technicians at the former Valley Gas location who are not members of United Steelworkers of America Local 12431. Those employees are members of a different union.

REQUEST:

1-3. Please indicate the number of NEGas employees that are required to be on site when service is being terminated, restored or activated.

RESPONSE:

One gas service technician generally is required to be on site when service is being terminated, restored or activated.

REQUEST:

- 1-4 Please indicate whether USWA employees of NEGas who terminate, restore or activate gas service have been licensed by the Rhode Island Department of Labor and Training ("DLT"). For this answer, please respond to the following:
 - a) Please indicate how many USWA employees of NEGas hold a DLT License.
 - b) Please indicate the type of DLT license(s) held by USWA employees of NEGas.
 - c) Please indicate how many USWA employees of NEGas obtained their license(s) prior to working for NEGas (or Providence Gas, Valley Gas or Bristol Warren Gas) and how many obtained the license while working for NEGas.
 - d) Please indicate whether any of the DLT licenses have an expiration date and if so, how many of the licenses are valid.

RESPONSE:

- a) Approximately 100 USWA employees hold the DLT license.
- b) The United Steelworkers of America employees hold the PJF Natural Gas Journeyman II license.
- c) United Steelworkers of America employees generally were not employed by Bristol Warren Gas or Valley Gas previously. There may be a few individual exceptions. With respect to United Steelworkers of America employees previously employed by Providence Gas and now employed by New England Gas, virtually all obtained their licenses while employed by Providence Gas or New England Gas. This is true because the license has been in place for a relatively short period of time and virtually all of these employees were employed by Providence Gas when the licensing procedure was established.
- d) All the DLT licenses held by USWA employees are active licenses. These licenses generally expire on the license holder's birthday at which time the license is renewed by the individual employee.

REQUEST:

1-5 Please describe the training process for USWA employees of NEGas (or Providence Gas, Valley Gas or Bristol Warren Gas for those employees who had been employed and trained by one of the gas companies prior to September 2001) by the relevant gas company for termination, restoration or activation or gas service.

RESPONSE:

Traditionally USWA employees of Providence Gas and New England Gas have followed a 4-1/2 year progression program in which one must advance to a Class A status through a series of three written exams and practical equipment examinations. An employee was required to pass examinations for the (1) helper class, (2) advanced helper class, (3) Class C, (4) Class B, and (5) Class A. Additionally an employee who failed to pass the Class A test would be required to either leave the department or, having passed the Class B exam but having failed the Class A exam, could stay in the department as a Class C employee. Class C employees are limited in their work to turn ons, shutoffs, leak complaints and work on gas water heaters. Class C employees have not been allowed to work on a home heating equipment such as boilers.

REQUEST:

1-6. Please indicate whether NEGas employees are required to participate in any regularly scheduled "refresher" training in the termination, restoration or activation of gas service. If so, please describe the "refresher" training.

RESPONSE:

In the past Providence Gas employees received regular training particularly with respect to new technology as it came on the market. Regrettably, the quality and frequency of training provided by New England Gas Company to its present employees has been drastically reduced. Employees have been advised that virtually no money has been budgeted for ongoing training purposes.

Respectfully submitted, USWA Local 12431 By its Attorney,

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CERTIFICATION

I hereby certify that on this 30th day of July, 2002, I forwarded a true copy of the within to the following:

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